

UNITED STATES DISTRICT COURT

for the

District of New Jersey



Civil Division

PETER I. SHAH

Case No. _____

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

MAPLE ENERGY HOLDINGS, LLC
RIVERSTONE HOLDINGS, LLC
RAILROAD COMMISSION OF TEXAS

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☐ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Peter I. Shah
Street Address	132 Montfort Dr.
City and County	Belle Mead, Somerset
State and Zip Code	New Jersey 08502
Telephone Number	908 432 5030
E-mail Address	petershah@msn.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Maple Energy Holdings, LLC
Job or Title <i>(if known)</i>	
Street Address	C/o The Corporation Trust Company
City and County	1209 Orange Street, Wilmington
State and Zip Code	Delaware 19801
Telephone Number	214-288-6682
E-mail Address <i>(if known)</i>	gayle@fractalresources.com

Defendant No. 2

Name	Riverstone Holdings, LLC
Job or Title <i>(if known)</i>	
Street Address	712 5th Ave, 36th Floor
City and County	New York Manhattan
State and Zip Code	New York 10019
Telephone Number	212-993-0076
E-mail Address <i>(if known)</i>	cabbate@riverstonecredit.com

Defendant No. 3

Name	Railroad Commission of Texas
Job or Title <i>(if known)</i>	
Street Address	1701 Congress Ave
City and County	Austin-Travis
State and Zip Code	Texas 78701
Telephone Number	432 684 5581
E-mail Address <i>(if known)</i>	andie.landis@rrc.texas.gov

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐

Federal question

☐

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

5th and 14th US Constitutional Amendments

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* Peter I. Shah, is a citizen of the State of *(name)* New Jersey.

b. If the plaintiff is a corporation

The plaintiff, *(name)*, is incorporated under the laws of the State of *(name)*, and has its principal place of business in the State of *(name)*.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)*, is a citizen of the State of *(name)*. Or is a citizen of *(foreign nation)*.

b. If the defendant is a corporation

The defendant, *(name)* Maple Energy Holdings, LLC, is incorporated under the laws of the State of *(name)* Delaware, and has its principal place of business in the State of *(name)* Texas.
 Or is incorporated under the laws of *(foreign nation)* _____,
 and has its principal place of business in *(name)* Please see attached.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:
 Illegal taking, trespassing, fraud, negligence, unauthorized use, damages, constitutional law violations, etc.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The defendants are engaged in unauthorized use of the real property owned by plaintiff in the State of Texas. The defendants are violating Texas Real property laws as well as the US Constitution. Please see the attached Certified Statement.

Plaintiff may apply for the Stay of defendants operations.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Immediate payment of \$600,000 (six hundred thousand dollars) for actual damages. These unauthorized oil and gas operations have been going on on the plaintiffs land for the past two years.
 Payment of \$2.4 million (two million and four hundred thousand dollars) in Punitive damages for the continuous oil spill, environmental hazards, illegal gas flaring/vent activities, etc. Please see the attached certified statement.

V. Certification and Closing

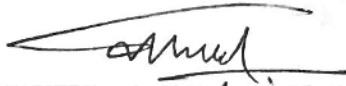
Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12/31/2021

Signature of Plaintiff



Printed Name of Plaintiff

Peter I. Shah

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Further answer to B-2-b

Defendant No. 2: Riverstone Holdings, LLC Is a New York based venture capital/credit fund. Mr. Christopher Abbate is one of the Principal. They are the financiers of all operations of Maple Energy Holdings, LLC.

www.riverstonellc.com

Defendant No. 3: The Railroad Commission of Texas is the state agency of government of Texas with primary regulatory jurisdiction over the oil and natural gas industry, pipeline transporters, natural gas and hazardous liquid pipeline industry, natural gas utilities, the LP-gas industry, and coal and uranium surface mining operations.

<https://www.rrc.texas.gov/>